EXHIBIT 1

DECLARATION OF SAMRAT BHATTACHARJEE

I, Samrat Bhattacharjee, declare as follows:

1.   I previously submitted a declaration in support of Google's Motion for Summary Judgment Regarding Claim 13 of U.S. Patent No. 9,967,615 against Sonos, Inc. ("Opening Declaration"). I submit this declaration in further support of Google's motion.

2.   Sonos's expert, Dr. Schmidt, opines that the "plain and ordinary meaning of the term 'local playback queue'" is "a data construct on the playback device that can contain one or more resource locators (*e.g.*, videoIds, URLs, or other resource locators), where each resource locator corresponds to multimedia content (*e.g.*, a particular song or video) that the playback device is to playback." Schmidt Decl., ¶69. I disagree that Dr. Schmidt's characterization is the plain and ordinary meaning of the term "local playback queue," as claimed. As I showed in my opening report, "[a] POSITA would understand that a typical implementation of a playback queue links together different multimedia items in a particular order using linked lists, arrays, vectors, or other well-known data structures" and "any implementation of a queue would allow for the storage of multiple items." Opening Decl., ¶70. "A POSITA would not consider a fixed set of named variables to be a playback 'queue.'" *Id*.

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7.   Dr. Schmidt further opines that adding "multimedia content" and "resource locators" to the playback queue would introduce "redundancy" in the claim language. Schmidt Decl., ¶114. I disagree.   A POSITA would understand that a playback device could store the multimedia content and resource locators. Such a system would allow the playback device to render the content when the device is offline. It would further enable flexibility by permitting the playback device to delete the content after a specified amount of time (for instance, due to restrictions placed on the content through digital rights management or memory capacity constraints) and re-fetching the content using the resource locator, as necessary, upon demand.

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9.   I have confirmed that YouTube and Google Play Music allow users to create playlists of variable size that may include hundreds or thousands of media items. I have not seen any part of the source code that restricts the size of the playback queue to three media items, whereas the alleged "local playback queues" that Dr. Schmidt has identified are restricted to at most three items.

I, Samrat Bhattacharjee, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: May 19, 2022

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Samrat Bhattacharjee